

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

MILLIMAN, INC., MILLIMAN)
SOLUTIONS, LLC, and VIGILYTICS)
LLC,)
)
Plaintiffs,)
)
vs.)
)
GRADIENT A.I. CORP., STANFORD A.)
SMITH, and SAMUEL CHASE PETTUS,)
)
Defendants.)
)

Civil Action No. 1:21-cv-10865-NMG

PLAINTIFFS' UNOPPOSED MOTION FOR LEAVE TO FILE UNDER SEAL

Pursuant to Local Rule 7.2, Plaintiffs Milliman, Inc., Milliman Solutions, LLC (collectively, “Milliman”), and Vigilytics LLC (“Vigilytics,” and together with Milliman, “Plaintiffs”) by and through undersigned counsel, hereby move for leave to file under seal certain material concerning the Plaintiffs’ Memorandum in Support of their Renewed Motion to Compel Discovery Responses (Dkt. #71). The material Plaintiffs seek leave to file under seal are referenced in Plaintiffs’ memorandum as Exhibits A–D.

As grounds for this motion, Plaintiffs submit that the information contained in Exhibits A–D is confidential and not publically known. Specifically, Exhibits A, C, and D contain details of Plaintiffs’ confidential information and trade secrets at issue in this matter. Exhibits B references details in Exhibits A, C, and D, which are confidential information and trade secrets. Plaintiffs submit the material should be filed under seal, and should remain under seal until returned to Milliman or further order of the Court.

WHEREFORE, for the reasons set forth above, Plaintiffs respectfully request that the Court grant this motion to allow Exhibits A–D to Plaintiffs’ Memorandum in Support of their Renewed

Motion to Compel Discovery Responses to be filed under seal and remain sealed until further order of the Court.

Dated: August 12, 2022

Respectfully submitted,

/s/ Christopher Centurelli

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CERTIFICATE OF SERVICE

I hereby certify that this document, filed through the ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing.

/s/ Christopher Centurelli

CERTIFICATE OF CONFERENCE

I hereby certify that, prior to filing this motion, counsel for the parties conferred via telephone call and email on August 10, 2022 in a good-faith attempt to resolve the matters contained in this motion. Counsel for Defendants stated that they do not object to Plaintiffs' request to file Exhibit A–D under seal.

/s/ Christopher Centurelli